

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Harriet Menezes,)
)
Plaintiff,)
)
v.)
)
Association of Flight Attendants, CWA, AFL-)
CIO, and Karen Scopa individually and as)
President of Association of Flight Attendants)
Boston, Sue Cook individually and as)
representative Secretary Association of Flight)
Attendant Boston and Steve Fontakis)
individually and as Manager at United Airlines)
and Paula DiMartino as Administrative)
Supervisor at United Airlines,)
)
Defendants.)
)

MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendant Paula DiMartino (“DiMartino”) hereby moves this Court to extend her time for responding to the complaint in this matter from August 24, 2004 to September 23, 2004. In support of this motion, DiMartino states as follows:

1. Plaintiff Harriet Menezes (“Plaintiff”), who is proceeding pro se, brings this action against her union, officers of her union, and two United Airline employees, including DiMartino. She purports to assert claims under the Family and Medical Leave Act, the Americans with Disabilities Act, Title VII, the Labor Management Relations Act.
2. Plaintiff served the complaint on DiMartino on August 3, 2004. Therefore, a response to the complaint is currently due by August 24, 2004.

3. The complaint is 20 pages long and contains detailed allegations concerning the defendants. Defendant DiMartino requires a thirty-day extension in order to investigate the allegations and prepare a response.

WHEREFORE, Defendant respectfully requests this Court allow this motion for a thirty (30) day extension of time in which to respond to the Complaint, to September 23, 2004.

Respectfully submitted,
PAULA DiMARTINO
By her Attorney(s),

/s/ Brigitte Duffy
Brigitte M. Duffy (BBO # 565724)
SEYFARTH SHAW LLP
World Trade Center East
Two Seaport Lane
Suite 300
Boston, MA 02210-2028
Telephone: (617) 946-4800
Telecopier: (617) 946-4801

DATED: August 12, 2004

Certificate of Compliance with Local Rule 7.1

I hereby certify that I conferred with the Plaintiff, Harriet Menezes (*pro se*), in an effort to narrow the issues in dispute before filing this motion with this Court by requesting that she assent to this extension of time. Plaintiff advised me by voicemail that she would not agree to the requested extension.

/s/ Brigitte Duffy
Brigitte M. Duffy

Certificate of Service

I, Brigitte M. Duffy, hereby certify that on August 12, 2004, I served a true copy of the foregoing document by first class mail on Harriet Menezes, 169 Thoreau Street, Unit 8, Concord, MA 01742.

_____/s/ Brigitte Duffy_____